

Exhibit 32

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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 Plaintiff,

15 vs.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

18 Defendants.

CASE NO. 3:17-cv-00939

**PLAINTIFF WAYMO LLC'S AMENDED
RULE 26(a)(3) WITNESS LIST**

Plaintiff Waymo LLC (“Waymo”) hereby provides its amended witness list pursuant to Fed. R. Civ. P., 26(a)(3) and paragraphs 1 and 2(a) of the Guidelines for Trial and Final Pre-Trial Conference in Civil Jury Cases Before the Honorable William Alsup.

Waymo identifies the name and, if not previously provided, the address, telephone number, and anticipated testimony of each witness it may present at trial other than solely for impeachment — separately identifying those the party expects to present and those it may call if the need arises. Waymo further reserves the right to call any witness on any of Defendant's witness lists, further including any of the witnesses identified by Defendants or Waymo on any subjects identified by either Defendants or Waymo.¹

I. WITNESSES WAYMO WILL PRESENT AT TRIAL

Name	Contact Information	Substance of Testimony
John Bares	May be reached through counsel for Uber	Mr. Bares will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo’s trade secrets, including their acquisition, use and disclosure, and the lack of independent development; acquisition of Otto; and Mr. Levandowski's employment milestones.
Gary Brown	May be reached through counsel for Waymo	Mr. Brown will provide non-cumulative testimony concerning Google/Waymo’s forensic investigation into misappropriation of trade secrets, particularly analysis of log data and hardware; Google/Waymo’s reasonable efforts to maintain the secrecy of its electronic systems, digital document storage repositories, and computer networks, including but not limited to the SVN server. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
Don Burnette	May be reached through	Mr. Burnette will be asked to provide non-cumulative testimony concerning

¹ Waymo's list includes witnesses who may be offered in rebuttal.

1		counsel for Uber	Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs and planner software; due diligence by Stroz for Otto acquisition by Uber; and destruction of relevant evidence.
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6	Hanley Chew	May be reached through counsel for Stroz Friedberg	Mr. Chew will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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9	Dan Chu	May be reached through counsel for Waymo	Mr. Chu will provide non-cumulative testimony regarding matters that concern Waymo, including investment in, development of, and management of Waymo's self-driving cars and autonomous vehicle technology; the current and future nature of the relevant markets and competition in the relevant markets, and other issues related to irreparable harm and damages suffered by Waymo, Waymo's short-term and long-term business plans, Waymo's early rider program in Phoenix, Waymo's launch of its TaaS service, and Waymo's understanding of the TaaS market (including competition in that market and Waymo's competitive advantages). Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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20	Andy Crain	May be reached through counsel for Waymo	Mr. Crain will provide expert testimony pertaining to forensic analysis of the devices the Diligenced Employees provided to Stroz Friedberg, including flaws in the Stroz due diligence process; devices not provided to Stroz; device connections and activity on Levandowski's MacBook computer; and browser history and download history on Levandowski's MacBook computer.
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25	Dmitri Dolgov	May be reached through counsel for Waymo	Dr. Dolgov will provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and associated self-driving vehicle software development; the development of certain
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1			of Waymo's trade secrets, Waymo's engineering practices, and the Chauffeur Bonus Plan. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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5	Pierre-Yves Droz	May be reached through counsel for Waymo	Mr. Droz will provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and the development of Waymo's trade secrets, time to develop Waymo's LIDAR designs and trade secrets, engineering practices of Waymo and the LIDAR team regarding the confidentiality of its designs and measures to keep them secret, the contents of Waymo's SVN server, and communications with Anthony Levandowski regarding Uber and formation of Otto. Waymo further identifies the subjects of Mr. Droz's prior declarations submitted in this matter, Dkt. 25-31, 453-3 as subject he may testify about as well as the Rule 30(b)(6) topics for which he was designated as Waymo's corporate witness.
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17	Nathaniel Fairfield	May be reached through counsel for Waymo	Mr. Fairfield will provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its motion planner and self-driving vehicle software development; the development of certain of Waymo's trade secrets, time to develop certain of Waymo's motion planner designs and trade secrets, engineering practices of Waymo and the motion planning team regarding the confidentiality of its designs and measures to keep them secret.
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24	Eric Friedberg	May be reached through counsel for Stroz Friedberg:	Mr. Friedberg will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report, and the Uber-Otto acquisition; Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use
25		Melanie Blunschi	
26		Latham & Watkins	
27		505 Montgomery Street, Suite	
28			

1		2000	and disclosure.
2		San Francisco, CA 94111-6538	
3		Direct Dial: +1.415.395.8129	
4		Email: melanie.blunschi@lw.com	
5			
6	John Gardner	May be reached through counsel:	Mr. Gardner will be asked to provide non-
7		Merri Baldin	cumulative testimony regarding
8		Rogers Joseph O'Donnell	Ottomotto and Otto Trucking; the Uber-
9		311 California Street, 10th fl	Otto acquisition; Mr. Levandowski's
10		San Francisco, CA 94104	businesses; the Stroz due diligence
11		415.956.2828 main mbaldwin@rjo.com	analysis, investigation, and report; the
12	William Grossman	May be reached through counsel for Waymo	misappropriation of Waymo trade secrets;
13			destruction of relevant evidence; and Tyto
14			LiDAR.
15	Dan Gruver	May be reached through counsel for Uber	Mr. Grossman will provide non-
16			cumulative testimony regarding Waymo's
17			accidental receipt of an email containing
18			an Otto LiDAR PCB.
19	Kristin Gunjonsson	May be reached through counsel for Waymo	Mr. Gruver will be asked to provide non-
20			cumulative testimony regarding
21			Defendants' misappropriation of
22			Waymo's trade secrets, including their
23			acquisition, use and disclosure, and the
24			lack of independent development; and the
25			development of Waymo's self-driving car
26	Mary Fulginiti	May be reached through counsel for Stroz Friedberg	technology, including its LIDAR designs.
27			Mr. Gudjonsson will provide non-
28	Bill Gurley	May be reached through	cumulative testimony concerning
			Google/Waymo's forensic investigation
			into misappropriation of trade secrets,
			particularly analysis of hardware;
			Google/Waymo's reasonable efforts to
			maintain the secrecy of its electronic
			systems, digital document storage
			repositories, and computer networks,
			including but not limited to the SVN
			server
			Ms. Fulginiti will be asked to provide
			non-cumulative testimony regarding the
			Stroz due diligence analysis,
			investigation, and report.
			Mr. Gurley will be asked to provide non-
			cumulative testimony regarding Uber's

1		counsel:	acquisition of Otto; board meetings,
2		Martin Flumenbaum	discussions, and knowledge concerning
3		1285 Avenue of the Americas	the Otto acquisition including Mr.
4		New York, NY 10019	Kalanick and others' representations; facts
5		(212) 373-3191	surrounding Mr. Kalanick and board
6		mflumenbaum@paulweiss.com	discussions concerning his termination;
7			negotiations with Mr. Kalanick
8			concerning the Otto acquisition and his
9			resignation; Stroz due diligence report;
10	James Haslim	May be reached through	and representations made by Mr.
11		counsel for Uber	Kalanick regarding the Stroz report and
12			Otto acquisition; and Benchmark's claim
13			that Mr. Kalanick committed fraud and
14	Joshua Herbach	May be reached through	breached his fiduciary duty with respect
15		counsel for Waymo	to the Otto acquisition.
16			Mr. Haslim will be asked to provide non-
17			cumulative testimony regarding
18			Defendants misappropriation of Waymo's
19			trade secrets (including but not limited to
20			through Tyto LIDAR), including their
21	Lambertus		acquisition, use and disclosure, and the
22	Hesselink		lack of independent development.
23			Mr. Herbach will provide non-cumulative
24			testimony regarding the development of
25			Waymo's self-driving car technology,
26			including its motion planner and self-
27			driving vehicle software development; the
28			development of certain of Waymo's trade
			secrets, time to develop certain of
			Waymo's motion planner designs and
			trade secrets, engineering practices of
			Waymo and the motion planning team
			regarding the confidentiality of its designs
			and measures to keep them secret.
			Professor Hesselink will provide expert
			testimony pertaining to optics as it relates
			to a LiDAR system for a self-driving
			vehicle; general optics and LiDAR
			principles, background state of the art;
			explain Waymo's disclosed trade secrets
			relating to LiDAR optical systems and
			components and is expected to provide
			opinions regarding the level of skill and
			effort required to derive such trade secrets
			based on the available evidence in this
			case. Retained Prof. Hesselink is expected
			to also opine that Waymo's LiDAR
			systems embody certain of Waymo's
			disclosed trade secrets.

1			Prof. Hesselink is expected to further offer opinions that (i) Waymo undertook reasonable efforts to maintain certain disclosed trade secrets in relative secrecy; (ii) such trade secrets are not generally known by individuals within the relevant filed and/or are not readily ascertainable; and (iii) such trade secrets derive independent economic value by virtue of their not being generally known in the relevant field. Additionally, Prof. Hesselink is expected to opine regarding Defendants' misappropriation of certain of Waymo's disclosed trade secrets based on (i) contemporaneous technical evidence reflecting Defendants' acquisition, use, and/or disclosure of Waymo's disclosed trade secret concepts; (ii) the similarity of Defendants' technology to Waymo's disclosed trade secrets and/or Waymo's implementation of such trade secrets in Waymo's commercial products; and/or (iii) the lack of evidence supporting Defendants' independent development of their own technology.
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15	Jeff Holden	May be reached through counsel for Uber	Mr. Holden will be asked to provide non-cumulative testimony regarding the state of Uber's autonomous vehicle program before the Otto acquisition; negotiations with Mr. Levandowski regarding the acquisition; Mr. Levandowski's consulting work; facts surrounding Mr. Levandowski's continued employment with Uber and termination; and Defendants' misappropriation of Waymo's trade secrets.
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21	Jonathan How	May be reached through counsel for Waymo	Professor How will provide expert testimony pertaining to software and motion planning for a self-driving vehicle; general motion planning and self-driving software background, background state of the art; explain Waymo's disclosed trade secrets relating to motion planning and self-driving software and is expected to provide opinions regarding the level of skill and effort required to derive such trade secrets based on the available evidence in this case. Prof. How is expected to also opine that certain of Waymo's systems embody certain of Waymo's disclosed trade secrets.
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1			Prof. How is expected to further offer opinions that (i) Waymo undertook reasonable efforts to maintain certain disclosed trade secrets in relative secrecy; (ii) such trade secrets are not generally known by individuals within the relevant filed and/or are not readily ascertainable; and (iii) such trade secrets derive independent economic value by virtue of their not being generally known in the relevant field.
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7	Ben Ingram	May be reached through counsel for Waymo	Mr. Ingram will provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and associated self-driving vehicle software development; the development of certain of Waymo's trade secrets.
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11	Michael Janosko	May be reached through counsel for Waymo	Mr. Janosko will provide non-cumulative testimony regarding reasonable measures to protect security at Google and Waymo, including Google's enterprise infrastructure.
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14	Travis Kalanick	May be reached through counsel:	Mr. Kalanick will be asked to provide non-cumulative testimony regarding Uber's driverless car program; Uber's solicitation of Google and Waymo employees; discussions with, knowledge about, Levandowski, discussions with the Board and Benchmark partners concerning the Otto acquisition, Mr. Levandowski, and the relationship between the facts surrounding this case and his termination; negotiations with Mr. Levandowski regarding the founding of Ottomotto and Otto Trucking, and Otto acquisition; the Uber-Otto acquisition; solicitation of Google/Waymo employees; the Stroz due diligence analysis, investigation, and report; Uber's knowledge of stolen documents, understanding, and activity related to misappropriation of Google/Waymo trade secret and proprietary information; Levandowski's employment and continued employment at Uber; and destruction of relevant evidence.
15		Melinda Haag	
16		Orrick	
17		405 Howard Street	
18		San Francisco, CA 94105-2669	
19		+1 415 773 5495	
20		mhaag@orrick.com	
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27	Rudy Kim	MoFo	Mr. Kim will be asked to provide non-cumulative testimony regarding the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; and
28		May be reached through	

1		counsel for Uber	destruction of relevant evidence.
2	Anthony	May be reached through	Mr. Levandowski will be asked to provide non-cumulative testimony regarding the development of Waymo's self-driving car technology, including its LIDAR designs and the development of Waymo's trade secrets, engineering practices of Waymo and the LIDAR team regarding the confidentiality of its designs and measures to keep them secret, his performance at Waymo, the contents of Waymo's SVN server, and communications with Google employees regarding Uber and formation of Otto; Uber's driverless car program; Uber's solicitation of Google and Waymo employees; the relationship between the facts surrounding this case and his termination; negotiations regarding the founding of Ottomotto and Otto Trucking, and Otto acquisition; the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; Uber's knowledge of stolen documents, understanding, and activity related to misappropriation of Google/Waymo trade secret and proprietary information; Levandowski's employment and continued employment at Uber; and destruction of relevant evidence. Waymo further identifies those subjects identified in Waymo's Statement Regarding Questions it Intends to Ask Anthony Levandowski at Trial. Dkt. 835.
3	Levandowski	counsel:	
4		Miles Erlich	
5		Ramsey & Ehrlich LLP	
6		803 Hearst Avenue	
7		Berkeley, CA 94710	
8		Tel: (510) 548-3600	
9		miles@ramsey-ehrlich.com	
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19	John Krafcik	May be reached through	Mr. Krafcik will provide non-cumulative testimony regarding Waymo's business; Anthony Levandowski, and his departure from Google; the relationship between Waymo and Google; and Waymo's development of its TaaS service, and valuations of Chauffeur.
20		counsel for Waymo	
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23	Melanie Maugeri	May be reached through	
24		counsel for Stroz Friedberg	Ms. Maugeri will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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26	Brian McClendon	May be reached through	Mr. McClendon will be asked to provide non-cumulative testimony regarding solicitation of and negotiations with Levandowski regarding founding Ottomotto and Otto Trucking; and the Uber-Otto acquisition, the development
27		counsel for Uber	
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1			of Uber's self-driving technology, including before the Otto acquisition, Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development.
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5	Rhian Morgan	May be reached through counsel for Uber	Ms. Morgan will be asked to provide non-cumulative testimony regarding the founding and business of Ottomotto and Otto Trucking; Uber's acquisition of Otto; and the Stroz due diligence analysis, investigation, report; Defendants misappropriation of Waymo's trade secrets, destruction of relevant evidence.
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9	Angela Padilla	May be reached through counsel for Uber	Ms. Padilla will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report; Levandowski's employment and continued employment at Uber; the relationship between the facts surrounding this case and his termination; and the Uber-Otto acquisition, Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development, destruction of relevant evidence.
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16	Gaetan Pennecot	May be reached through counsel for Uber	Mr. Pennecot will be asked to provide non-cumulative testimony regarding Defendants' misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs.
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21	Cameron Poetzcher	May be reached through counsel for Uber	Mr. Poetzcher will be asked to provide non-cumulative testimony regarding Uber's negotiations with Mr. Levandowski regarding the formation of Ottomotto/Otto Trucking; and the acquisition; solicitation of Google/Waymo employees; destruction of relevant evidence; and the Stroz due diligence analysis, investigation, and report.
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26	Nina Qi	May be reached through counsel for Uber	Ms. Qi will be asked to provide non-cumulative testimony regarding Uber's decision to acquire Ottomotto (and to enter into an option to acquire Otto Trucking); contacts between Uber and
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1			Mr. Levandowski regarding the formation of Ottomotto / Otto Trucking, Uber's acquisition of those entities, and the benefits that Uber would obtain via those acquisitions; Uber's solicitation of Google/Waymo employees; Uber's internal views on those subjects, destruction of relevant evidence; and the Stroz due diligence analysis, investigation, and report.
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7	Martin Rinard	May be reached through counsel for Waymo	Professor Rinard will provide expert testimony regarding Defendants' misappropriation of certain of Waymo's disclosed trade secrets related to motion planning and self driving software based on (i) contemporaneous technical evidence reflecting Defendants' acquisition, use, and/or disclosure of Waymo's disclosed trade secret concepts; (ii) the similarity of Defendants' technology to Waymo's disclosed trade secrets and/or Waymo's implementation of such trade secrets in Waymo's commercial products; and/or (iii) the lack of evidence supporting Defendants' independent development of their own technology.
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16	Lior Ron	May be reached through counsel:	Mr. Ron will be asked to provide non-cumulative testimony regarding the misappropriation of Waymo trade secrets; founding of Ottomotto and Otto Trucking; the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; and the business and product development of Ottomotto and Otto Trucking, destruction of relevant evidence.
17		Taylor & Patchen, LLP	
18		One Ferry Building, Suite 355	
19		San Francisco, CA 94111	
20		T: (415) 788-8200	
21	Bryan Salesky	May be contacted through counsel:	Mr. Salesky will provide non-cumulative testimony regarding the history of Google/Waymo's self-driving-car development efforts; Mr. Levandowski's performance as a Google/Waymo employee; certain of Mr. Levandowski's communications with Uber prior to his departure from Google/Waymo
22		Stacy North	
23		Pierce & Shearer LLP	
24		snorth@pierceshearer.com	
25		650-843-1900	
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28	Brent Schwarz	May be reached through	Mr. Schwarz will be asked to provide non-cumulative testimony regarding

1		counsel for Uber	Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; regarding Tyto LiDAR and Otto's acquisition of Tyto.
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4	Ognen Stojanovski	May be reached through counsel for Uber	Mr. Stojanovski will be asked to provide non-cumulative testimony regarding Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; regarding Tyto LiDAR and Otto's acquisition of Tyto; regarding communications with Mr. Levandowski regarding Tyto LIDAR and other businesses related to Mr. Levandowski.
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10	Justin Suhr	May be reached through counsel for Uber	Mr. Suhr will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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13	Eric Tate	May be reached through counsel for MoFo	Mr. Tate will be asked to provide non-cumulative testimony regarding the Uber-Otto acquisition; the Stroz due diligence analysis, investigation, and report; and destruction of relevant evidence.
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16	Jim Timmins	May be reached through counsel for Waymo	Mr. Timmins will provide expert testimony regarding customary practices with respect to M&A transactions (including regarding indemnification) and the consideration paid by Uber to acquire Ottomotto (including relative to other acquisitions).
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20	Chris Urmson	May be reached through counsel:	Mr. Urmson will provide non-cumulative testimony regarding the history and development of Waymo's self-driving car technology, including its LIDAR designs; Mr. Levandowski's performance at Google and circumstances surrounding his termination from Google; Chauffeur Bonus Plan; Waymo valuation(s).
21		Benjamin L. Singer	
22		601 Montgomery St.	
23		Suite 1950	
24		San Francisco, CA 94111	
25		<u>415-500-6080</u>	
26	Michael Wagner	May be reached through counsel for Waymo	Mr. Wagner will provide non-cumulative testimony regarding the relevant markets, irreparable harm, and the unjust enrichment and reasonable royalty measures of damages resulting from Defendants' misappropriation of
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1			Waymo's trade secrets.
2	Tim Willis	May be reached through counsel for Waymo	Mr. Willis will provide non-cumulative testimony regarding Waymo's supply chain operation, including reasonable steps taken to protect confidential and proprietary information shared with suppliers.
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6	Salle Yoo	May be reached through counsel for Uber	Ms. Yoo will be asked to provide non- cumulative testimony regarding the Uber- Otto acquisition; the Stroz due diligence analysis investigation, and report; continued employment and termination of Anthony Levandowski; and Defendants misappropriation of Waymo's trade secrets, destruction of relevant evidence.
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10	Sasha Zbrozek	May be reached through counsel for Waymo	Mr. Zbrozek will provide non-cumulative testimony concerning Google/Waymo's forensic investigation, particularly the SVN server and related log data, including Mr. Levandowski's download of the 14,000 files from the SVN server; Google/Waymo's reasonable efforts to maintain the secrecy of its electronic systems, digital document storage repositories, and computer networks
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16 **II. WITNESSES WAYMO MAY PRESENT AT TRIAL IF THE NEED ARISES**

19	Name	Contact Information	Substance of Testimony
20	Eric Armursky	O'Melveny	Mr. Armursky will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
21		2765 Sand Hill Road	
22		Palo Alto, CA 94025	
23		(650) 473-2644	
24		eamdursky@omm.com	
25	Tara Allport	May be reached through counsel for Stroz Friedberg	Ms. Allport will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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28	Cristina Antalik	May be reached through	Ms. Antalik will be asked to provide non-cumulative

1		counsel for Stroz Friedberg	testimony regarding the Stroz due diligence analysis, investigation, and report.
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3	Alisa Baker	Levine & Baker	Ms. Baker will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
4		466 Green Street	
5		Suite 303	
6		San Francisco, CA 94133	
7		(415) 391-2995	
8	Chelsea Bailey	May be reached through counsel for Waymo	Ms. Bailey will provide non-cumulative testimony regarding the Chauffeur Bonus Plan; Mr. Levandowski's departure from Google, including Google's collection of Levandowski's laptops and delivery of those laptops to the Google forensics team; and Mr. Levandowski's performance as a Google/Waymo employee
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15	Shawn Bananzadeh	May be reached through counsel for Waymo	Mr. Bananzadeh will provide non-cumulative testimony regarding costs of development of, and management of Waymo's self-driving cars and autonomous vehicle technology. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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21	Travis Bellanger	May be reached through counsel for Waymo	Mr. Bellanger will provide non-cumulative testimony concerning Google/Waymo's forensic investigation into the activities of Anthony Levandowski, including Google's collection of Levandowski's laptops and delivery of those laptops to the Google forensics team
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26	Adam Bentley	May be reached through counsel for Uber	Mr. Bentley will be asked to provide non-cumulative testimony regarding the Uber-Otto acquisition; the Stroz due diligence analysis,
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1			investigation, and report; and
2			destruction of relevant
3	Matthew Blattmachr	Bismuth Trust; May be	Mr. Battmachr will be asked to
4		reached through counsel:	provide non-cumulative
5		Diane F. Vallentine	testimony regarding the
6		Jermain, Dunnagan & Owens,	ownership of Levandowski's
7		PC	companies
8		3000 A Street, Suite 300	
9		Anchorage, AK 99503	
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11	Scott Boehmke	May be reached through	Mr. Boehmke will provide
12		counsel for Uber	non-cumulative testimony
13			concerning Defendants
14			misappropriation of Waymo's
15	Judith Branham	May be reached through	trade secrets, including their
16		counsel for Stroz Friedberg	acquisition, use and disclosure,
17			and the lack of independent
18	Neel Chatterjee	May be reached through	development.
19		counsel for Otto Trucking	
20			Mr. Branham will be asked to
21			provide non-cumulative
22			testimony regarding the Stroz
23			due diligence analysis,
24	Mitchell Dobi	May be reached through	investigation, and report.
25		counsel for Stroz Friedberg	
26			Mr. Chatterjee will be asked to
27	Gerard Dwyer	May be reached through	provide non-cumulative
28		counsel for Waymo	testimony regarding Goodwin
			Procter's possession of
			misappropriated materials;
			destruction of relevant
			evidence; chain of custody of
			Anthony Levandowski's
			personal laptops, and searches
			thereof.
			Mr. Dobi will be asked to
			provide non-cumulative
			testimony regarding the Stroz
			due diligence analysis,
			investigation, and report.
			Mr. Dwyer will provide non-
			cumulative testimony
			regarding inputs to Waymo's
			current P&L. He may also

1			provide testimony regarding Waymo's current business plan.
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3	Paul French	May be reached through counsel for Waymo	Rebuttal of expert testimony of Kevin Faulkner, including opinions related to the various flaws and errors in Stroz's search for Waymo confidential information at Uber; rebuttal of expert testimony of Erik Laykin, including opinions related to the Waymo forensic investigation, Anthony Levandowski's download of the 14,000 files, Radu Raduta's download of confidential documents from Google Drive and Sameer Kshirsagar's download of confidential documents from Google Drive
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13	Christine Gabitass	May be reached through counsel for Stroz Friedberg	Ms. Gabitass will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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16	Arturo Gonzalez	MoFo; May be reached through counsel for Uber	Mr. Gonzalez will be asked to provide non-cumulative testimony regarding MoFo's possession of misappropriated materials; destruction of relevant evidence; and Defendants' knowledge of same. As Waymo previously advised Uber, Waymo does not intend to call Mr. González as a witness unless Defendants open the door by claiming that they complied with their discovery obligations.
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23	Gataum Gupta	May be reached through counsel for Uber	Mr. Gupta will be asked to provide non-cumulative testimony regarding Uber's acquisition of Ottomotto and Uber's funding of Otto Trucking's business activities.
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27	Bruce Hartley	May be reached through counsel for Waymo	Rebuttal of expert testimony of Erik Laykin, including opinions related to security measures taken by
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1			Google/Waymo to protect their confidential and proprietary information, including but not limited to materials stored in Waymo's SVN repository
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4	Don Harrison	May be reached through counsel for Waymo	Mr. Harrison will provide non-cumulative testimony regarding Google's mergers and acquisitions, including the negotiation and drafting of Google's merger and acquisition agreements, the process of conducting valuations, and Waymo's valuations.
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10	Jennifer Haroon	May be reached through counsel for Waymo	Ms. Haroon will provide non-cumulative testimony regarding details of Waymo's first P&L, the negotiation of the valuation used in connection with the Chauffeur Business Plan, the timing of payments made under the Chauffeur Business Plan, and the 409(a) valuation conducted when Waymo was spun off from Google. Ms. Haroon may also provide testimony regarding the evolution of Waymo's business plan over time. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which she was designated as Waymo's corporate witness.
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21	Soren Juelsgaard	May be reached through counsel for Uber	Mr. Juelsgaard will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs and software; due diligence by Stroz for Otto acquisition by Uber; and destruction of
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1			relevant evidence.
2	Asheem Linaval	May be reached through counsel for Uber	Mr. Linaval will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self- driving car technology, including its LIDAR designs.
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8	David Lawee	May be reached through counsel for Waymo	Mr. Lawee will provide non- cumulative testimony regarding Google's mergers and acquisitions, including the negotiation and drafting of Google's merger and acquisition agreements, the process of conducting valuations, Waymo's valuations, and the Chauffeur Bonus Plan. Waymo further identifies the subjects of the Rule 30(b)(6) topic(s) for which he was designated as Waymo's corporate witness.
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16	Max Levandowski	May be reached through counsel for Uber	Mr. Levandowski will be asked to provide non- cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self-driving car technology, including its LIDAR designs.
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23	Christian Lymn	May be reached through counsel for Uber	Mr. Lymn will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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26	Jessica Madore	May be reached through counsel for Stroz Friedberg	Ms. Madore will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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1	Kenneth Mendelson	May be reached through counsel for Stroz Friedberg	Mr. Mendelson will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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4	Emil Michael	May be reached through counsel:	Mr. Michael will be asked to provide non-cumulative testimony regarding the negotiations with Levandowski regarding founding Ottomotto and Otto Trucking; the Uber- Otto acquisition;
5		Margaret Tough	Levandowski's employment and continued employment at Uber; discussions with, knowledge about,
6		Latham & Watkins	Levandowski, discussions with the Board and Benchmark partners concerning the Otto acquisition, Mr. Levandowski, and the relationship between the facts surrounding this case and his termination.
7		505 Montgomery Street	
8		Suite 2000	
9		San Francisco, CA 94111	
10		(415) 391-0600	
11		margaret.tough@lw.com	
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14	Christine Oropeza	May be reached through counsel for Stroz Friedberg	Ms. Oropeza will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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17	Daniel Ratner	May be reached through counsel for Ratner	Mr. Ratner will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self- driving car technology, including its LIDAR designs.
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23	Colin Sebern	May be reached through counsel for Uber	Mr. Sebern will be asked to provide non-cumulative testimony concerning Defendants misappropriation of Waymo's trade secrets, including their acquisition, use and disclosure, and the lack of independent development; the development of Waymo's self- driving car technology, including its LIDAR designs and software; due diligence by
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1			Stroz for Otto acquisition by Uber.
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3	Timothy Schirm	May be reached through counsel for Stroz Friedberg	Mr. Schirm will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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6	Joe Shapiro	May be reached through counsel for Stroz Friedberg	Mr. Shapiro will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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9	Sharat Sridhar	May be reached through counsel for Stroz Friedberg	Mr. Sridhar will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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12	Aditi Tatti	May be reached through counsel for Stroz Friedberg	Mr. Tatti will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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15	Charles Wille	May be reached through counsel for Stroz Friedberg	Mr. Wille will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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18	Wendy Wu	May be reached through counsel for Stroz Friedberg	Ms. Wu will be asked to provide non-cumulative testimony regarding the Stroz due diligence analysis, investigation, and report.
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III. WITNESSES WHO MAY TESTIFY BY DEPOSITION

The following witnesses may testify by deposition:

Anthony Levandowski

Travis Kalanick

Nina Qi

Bill Gurley

Jeff Holden

1 John Bares
2 Gaetan Pennecot
3 Dan Gruver
4 James Haslim
5 Cameron Poetzcher
6 Scott Boehmke
7 Lior Ron
8 Adam Bentley
9 Rhian Morgan
10 Don Burnette
11 Soren Julesgaard
12 Ognen Stojanovski
13 Salle Yoo
14 Gataum Gupta
15 Emil Michael
16 Asheem Lineval
17 Colin Sebern
18 Brent Schwarz
19 Angela Padilla
20 Justin Suhr
21 Eric Tate
22 Rudy Kim
23 John Gardner
24 Chris Urmson
25 Brian McClendon
26 Bryan Salesky
27 Eric Friedberg
28 Hanley Chew

1 Mary Fulginiti

2 Melanie Maugeri

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4 DATED: October 23, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

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6 By /s/ Charles K. Verhoeven

Charles K. Verhoeven
Attorneys for WAYMO LLC